



Charlie Lopez <charlielopez@gmail.com>

Rule 26 meeting

2 messages

Jaime Luis Sanabria Montañez <jsanabria@sbgblaw.com>

Wed, Aug 30, 2017 at 2:38 PM

To: "Carlos F. López" <charlielopez@gmail.com>

Cc: Arturo V Bauermeister <abauermeister@sbgblaw.com>, Manuel Martin <mmartin@sbgblaw.com>

Dear Charlie and Paco,

As usual, it was a pleasure meeting with you Monday morning. This email memorializes Monday morning's Rule 26 meeting, where we reached the following agreements:

As to Plaintiffs' Request No. 2, all agreed that, assuming they exist, the defendants would produce the "minutes of the meeting of the trustees to establish the plan." All also agreed that the defendants would not be waiving any privileges or otherwise be barred from protecting any confidential information. The defendants also agreed to search for the "PBGC regarding coverage of Title IV of ERISA in Puerto Rico," and, if it does not exist, to so certify it to the plaintiffs. (In a sign of good faith, moreover, the defendants agreed to an unrelated request to produce the Spanish version of the "Plan Document of Archdiocese of San Juan Pension Plan.")

As to Plaintiffs' Request No. 3, the defendants will do their best good-faith effort to find these purported plan summaries. (In a sign of good faith, moreover, the plaintiffs agreed to an unrelated request to send to the defendants the two purported versions of the plan summaries in question.)

As to Plaintiffs' Request No. 5, the parties found common ground and decided that the defendants would supplement their production and thus produce *only the names* of the administrators.

As to Plaintiffs' Request No. 8, the defendants agreed to furnish the requested information.

As to Plaintiffs' Request No. 13, the defendants, in a good-faith effort to solve the impasse, agreed to attempt to find the requested information (regarding any investment brokers, etc.).

As to Plaintiffs' Request No. 14 and 15, the defendants, in a good-faith effort to solve the impasse, agreed to attempt to find the requested information. All also agreed that the defendants would not be waiving any privileges or otherwise be barred from protecting any confidential information.

As to Plaintiffs' Request/Interrogatories 17, 18, and 19, the plaintiffs, in a good-faith effort, agreed to set them aside, as all parties agreed that they were arguments that were better suited for a motion or response thereto.

And, as to Plaintiffs' Request No. 21, the defendants will provide a brief description of each document.

Finally, all agreed that a confidentiality agreement/entry of protective order was in order. And, in the spirit of finding further common ground, we suggest that we jointly ask the Court to stay both your deadline to oppose to our motion to strike and the deadline to oppose your motion to compel (this Thursday) for three weeks—so that we can focus all our energies in trying to solve the discovery impasses.

Cordially,

Jaime L. Sanabria Montañez | SBGB LLC

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Jaime Luis Sanabria Montañez <jsanabria@sbgblaw.com>

Wed, Aug 30, 2017 at 2:39 PM

To: "Carlos F. López" <charlielopez@gmail.com>

Cc: Arturo V Bauermeister <abauermeister@sbgblaw.com>, "frankzorrilla2@gmail.com" <frankzorrilla2@gmail.com>, Manuel Martin <mmartin@sbgblaw.com>

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